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No. 85-660

IN THE
SUPREME COURT OF THE UNITED STATES

October Term, 1985

STATE OF COLORADO,

Petitioner,

v.

FRANCIS BARRY CONNELLY,

Respondent.

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SUPREME COURT, U.S.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF COLORADO

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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18pp

QUESTION PRESENTED FOR REVIEW

Did the prosecution meet its burden of proving that Respondent's statements were admissible, where unrebutted expert testimony established that these statements were not volitional but were involuntary and the product of command auditory hallucinations of a paranoid schizophrenic in active psychosis?

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FRANCIS BARRY CONNELLY,

Respondent.

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

Respondent Francis Barry Connelly respectfully requests that the Petition for Writ of Certiorari filed by the State of Colorado be denied.

CONSTITUTIONAL PROVISIONS INVOLVED

Colorado Constitution, Article II, Section 18:

No person shall be compelled to testify against himself in a criminal case nor shall any person be twice put in jeopardy for the same offense. If the jury disagrees, or if the judgment be arrested after the verdict, or if the judgment be reversed for error in law, the accused shall not be deemed to have been in jeopardy.

Colorado Constitution, Article II, Section 25:

No person shall be deprived of life, liberty or property, without due process of law.

United States Constitution, Amendment XIV:

SECTION I. All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; or shall any state deprive any person of life, liberty, or property, without due pro-

cess of law; nor deny to any person within its jurisdiction the equal protection of the laws.

STATEMENT OF THE CASE

On August 18, 1983, Respondent Francis Barry Connelly walked up to a uniformed police officer in Denver, Colorado, and said he had killed someone and wanted to tell the officer about it. Officer Anderson advised Mr. Connelly of his rights in accordance with Miranda v. Arizona,[1] conducted a brief search for weapons and placed handcuffs on Mr. Connelly. After the Miranda advisement, Mr. Connelly told the officer that, in late 1982, he had killed a girl with whom he had been traveling in Denver.

The officer contacted a detective, who asked Mr. Connelly additional questions and took him to police headquarters. Mr. Connelly identified the girl he had killed as Mary Anne Junta and later took detectives to the location where he had killed her and left the body. The body had been discovered in April 1983, but had not been identified.

Mr. Connelly was charged with Second Degree Murder, in violation of Colo. Rev. Stat. §18-3-103 (1978 Repl. Vol. 8). The Petition for Certiorari incorrectly states that first degree murder charges were filed. Mr. Connelly was declared incompetent to proceed and was treated at the Colorado State Hospital for approximately six months. After being found competent, Mr. Connelly filed a Motion to Suppress Statements and Evidence. This motion requested the suppression of Mr. Connelly's statements to police because they were not voluntary and because he had not knowingly, intelligently and voluntarily waived his Miranda rights. (Exhibit 1).

A suppression hearing was held on May 25, 1984. Dr. Jeffrey Metzner, a psychiatrist who had examined Mr. Connelly at the state hospital, testified as an expert witness. According to Dr. Metzner, Mr. Connelly suffered from chronic paranoid schizophrenia and had experienced auditory hallucinations which had compelled his confession.

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[1] 384 U.S. 436 (1966).

Dr. Metzner classified Mr. Connelly's auditory hallucinations as "command" hallucinations, which had a powerful effect on "his ability to make free and rational choices." (Reporter's transcript, Exhibit 2, p. 56). Mr. Connelly had described the voice he heard as God's voice, and told Dr. Metzner that God was his own father, now dead, and that he was Jesus Christ. (Exhibit 2, p. 55). This voice commanded him on August 17, 1983 to travel from his home in Boston to Denver and to confess to a policeman. (Exhibit 2, p. 52). After Mr. Connelly arrived in Denver, the voice told him that he had only two choices --to confess or to kill himself. (Exhibit 2, p. 53).

Dr. Metzner concluded that Mr. Connelly had been unable to make a free and intelligent decision to make a statement. Mr. Connelly felt that he had no choice about making a confession, and felt that he had to act on his command from God. (Exhibit 2, pp. 58-59). According to Dr. Metzner, Mr. Connelly did not confess merely as a result of a guilty conscience but because he was psychotic at the time. (Exhibit 2, pp. 64-65). Dr. Metzner believed that Mr. Connelly's psychotic episode had begun at least as early as August 17, 1983, when he left Boston for Denver. (Exhibit 2, p.69).

The prosecution presented no expert testimony to rebut Dr. Metzner's opinion. The patrol officer and a detective, to whom Mr. Connelly spoke on August 18, 1983, testified that he did not appear to be mentally ill. However, Dr. Metzner testified that Mr. Connelly's psychosis was such that his behavior would have appeared normal to most observers. (Exhibit 2, pp. 61-62).

At the conclusion of the suppression hearing, the trial court found:

> [T]here's no question that the Defendant did not exercise free will in choosing to talk to the police. He exercised a choice both of which were mandated by auditory hallucination, had no basis in reality and were the product of a psychotic break with reality. The Defendant at the time of the confession had absolutely in the Court's estimation no volition or choice to make. He was compelled by his illness to do that which he did, and he did so in a manner

> which is not unusual for people who suffer schizophrenia. He was able to do so so that trained, experienced police officers were not able to discern the mental difficulty that the Defendant was having.

(Exhibit 2, pp.88-89). The trial court ruled that the prosecution had not met its burden of proving by a preponderance of the evidence that Mr. Connelly's statement was voluntary. Additionally, the trial court ruled that the prosecution had failed to prove by clear and convincing evidence that Mr. Connelly had voluntarily, knowingly and intelligently waived his Miranda rights.

The trial court's rulings were affirmed in the prosecution's interlocutory appeal to the Colorado Supreme Court. According to the supreme court, the evidence in the record clearly supported the district court's conclusion.

REASONS FOR DENYING THE WRIT

I

THE DECISION OF THE COLORADO SUPREME COURT WAS SUPPORTED BY INDEPENDENT AND ADEQUATE STATE GROUNDS.

This Court has historically and consistently refused to review decisions which rest upon adequate and independent state grounds. Michigan v. Long, 463 U.S. 1032 (1983), Fox Film Corporation v. Muller, 296 U.S. 207, 210, (1935). The opinion of the Colorado Supreme Court in People v. Connelly, 702 P.2d 722 (1985), is based upon such grounds. Therefore, the state's petition for a Writ of Certiorari should be denied.

It has long been settled that were the judgment of a state court rests upon two grounds, one of which is federal and the other nonfederal in character, this Court has no jurisdiction if the nonfederal ground is independent of the federal, and is adequate to support the judgment. Fox Film Corporation v. Muller, 296 U.S. at 210; Klinger v. Missouri, 13 Wall. 257, 263, (1872). The basis for this rule has been described as follows:

> Our only power over state judgments is to correct them to the extent that they incorrectly adjudge federal rights. And our power is to correct wrong judg-

> ments, not to revise opinions. We are not permitted to render an advisory opinion, and if the same judgment would be rendered by the state court after we corrected its views of federal laws, our review could amount to nothing more than an advisory opinion.

Herb v. Pitcairn, 342 U.S. 117, 125-26 (1945).

As this Court has recognized, the test of voluntariness has been clearly established "in Anglo-American courts for two hundred years." Culombe v. Connecticut, 367 U.S. 568, 602 (1961). Colorado has a long history of cases dealing with voluntariness issues. In 1899, the Colorado Supreme Court recognized and addressed the issue of voluntariness in Fincher v. People, 210 Colo. 169, 56 P.902 (1899). In 1905, the Colorado Supreme Court relied on existing nonfederal law and on Article II, Section 18 of the Colorado Constitution in addressing the voluntariness of a defendant's statements to a coroner's jury. Tuttle v. People, 33 Colo. 243, 79 P.1035 (1905).

> [T]he important question to determine in cases of this character is, was the statement voluntary? If this question can be answered in the affirmative, then the statement is clearly admissible on a principle, the soundness of which is not disputed; but, is not voluntary, or if obtained by any degree of coercion, then it must be rejected. No hard and fast rule can be formulated which would serve as the test in every instance, but each case must be determined upon its own circumstances.

79 P. at 1038. (Emphasis added).

In 1927, the Colorado Supreme Court again addressed the issue of voluntariness in Osborn v. People, 83 Colo. 4, 262 P.892 (1928). Citing only Colorado case law, the Court relied on Fincher v. People, and Tuttle v. People and reaffirmed that to be admissible, a confession must be voluntary, and the the question of admissibility is for the court.

This line of cases forms the basis for subsequent Colorado Supreme Court decisions on voluntariness. More recent Colorado cases adhere to these long-established principles of voluntariness. See, e.g., Keener v. People, 194 Colo. 244, 572 P.2d 463 (1977) (Erickson, J., concurring); People v. York, 189 Colo. 16, 537 P.2d 294 (1975); People v. Shearer, 181 Colo. 237, 508 P.2d 263

(1968); Gould v. People, 167 Colo. 113, 445 P.2d 580 (1968).

The state supreme court in Connelly relied on only four decisions of this Court, which stand only for fundamental principles of law and do not supplant the long history of Colorado voluntariness cases. As Petitioner has conceded, the Connelly court cited Lego v. Twomey, 404 U.S. 477 (1972), only for the "well accepted rule" that prosecutors must prove voluntariness by a preponderance of the evidence. The court also relied for this principle upon one of its earlier decisions, People v. Raffaelli, 647 P.2d 230 (Colo. 1982).

The court in Connelly similarly relied on the Raffaelli opinion, as well as Townsend v. Sain, 372 U.S. 293 (1963), to describe the well-established standard for evaluating the voluntariness of a statement: "whether the statement was the product of a rational intellect and a free will" 702 P.2d at 728. The Raffaelli opinion also was cited, along with Culombe v. Connecticut, 367 U.S. 568 (1961), for the basic principle that the totality of the circumstances surrounding a statement must be considered in determining its voluntariness. In each instance, the Colorado Supreme Court indicated that it was citing Raffaelli and Lego, Townsend and Culombe only as examples of the fundamental propositions used in its analysis in Connelly. This is apparent because the Colorado Supreme Court prefaced its citations to these cases with the signal, "E.g.," which means "for example." Black's Law Dictionary 462 (5th Ed. 1979).

The Colorado Supreme Court relied on a decision of this Court as direct authority only once in addressing the voluntariness of Mr. Connelly's statements to police. The opinion below cites Culombe as authority for the principle that due process of law is violated if the prosecution uses at trial a statement which is not the "product of an essentially rational and free choice by its maker." 702 P.2d at 728. However, the Colorado Supreme Court in Raffaelli recognized that the due process clause of the United States Constitution precludes the admission of involuntary confessions and stated, "Our state constitution requires no less."

647 P.2d at 234.

The thrust of Petitioner's argument is that police coercion or inducement must be established before a statement can be excluded as involuntary. After concluding that a statement may be involuntary in the absence of police coercion or duress, the Colorado Supreme Court in Connelly noted that the "capacity for rational judgment and free choice may be overborne as much by certain forms of severe mental illness as by external pressure." 702 P.2d at 728. The opinion below refers to Blackburn v. Alabama, 361 U.S. 199 (1960), with a "See" signal, indicating that the state supreme court considered Blackburn as only indirect authority.

In concluding that Mr. Connelly's statements were involuntary although they were not the result of police coercion or inducement, the court below relied on a recent Colorado case, Hunter v. People, 655 P.2d 374 (Colo. 1982). In Hunter, the Colorado Supreme Court held that the admission of a statement to a private security guard without a prior hearing on its voluntariness violated due process. The prosecution argued that the defendant's confession to the security guard did not involve state action. However, the court in Hunter concluded that the prosecution's use of the statement at trial was state action. In reaching this holding, the Colorado Supreme Court cited only Townsend v. Sain, solely for its definition of an involuntary statement as one which is "not the product of a rational intellect and a free will." 655 P.2d at 376.

The Connelly court's decision on this point is supported by prior Colorado opinions. Colorado law has never required police misconduct as a prerequisite to a finding of involuntariness. In Martinez v. People, 55 Colo. 51, 132 P.64 (1913), the court ruled that a statement made by one asleep is not voluntary. In Read v. People, 122 Colo. 308, 221 P.2d 1070 (1950), the court reversed the Defendant's homicide conviction citing a series of physical and mental abuses by her husband during the previous twelve hours and stated:

> It is of no consequence how the condition was caused. Existing, it was sufficient to destroy the effect of the confessions as not being the product of a free and normal mind.

221 P.2d at 1077.

The decision below rested on an adequate and independant state ground. The Colorado Supreme Court did not feel "compelled by what it understood to be federal constitutional considerations to construe. . . its own law in the manner it did." Zacchini v. Scripts-Howard Broadcasting Co., 433 U.S. 562, 568 (1977).

II

THE COLORADO SUPREME COURT'S OPINION IS IN AGREEMENT WITH THIS COURT'S DECISIONS, AND IT IS CONSISTENT WITH CASE LAW FROM OTHER STATE COURTS.

Petitioner has asserted that the Colorado Supreme Court's opinion in Connelly conflicts with this Court's decisions on voluntariness. Petitioner argues that the state court has misinterpreted existing law, and implies that this Court's decisions require a finding of police coercion or misconduct before a statement can be ruled involuntary. The cases relied upon by Petitioner do not support this proposition, and one decision suggests the opposite conclusion.

The Colorado Supreme Court's analysis in Connelly is similar to that of this Court in Blackburn v. Alabama, 361 U.S. 199 (1960). In Blackburn the Court reversed the conviction of the defendant, diagnosed as a paranoid schizophrenic whose involuntary confession was used at trial. Conflicting expert testimony established that he "most probably" had been insane at the time of his confession. 361 U.S. at 203. Although the Court referred to the fact that the defendant had been interrogated for eight or nine hours in a small room, this fact was not the basis for the ruling that his confession was involuntary. In determining that use of the confession at trial violated due process of law, the Court focused rather on the conclu-

sion that it "most probably was not the product of any meaningful act of volition." 361 U.S. at 211. (Emphasis added). As the Court explained:

> In the case at bar, the evidence indisputably establishes the strongest probability that Blackburn was insane and incompetent at the time he allegedly confessed. Surely in the present stage of our civilization a most basic sense of justice is affronted by the spectacle of incarcerating a human being upon the basis of a statement he made while insane; and this judgment can without difficulty be articulated in terms of the unreliability of the confession, the lack of rational choice of the accused, or simply a strong conviction that our system of law enforcement should not operate so as to take advantage of a person in this fasion. And when the other pertinent circumstances are considered - the eight-to-nine hour sustained interrogation in a tiny room which was upon occasion literally filled with police officers; the absence of Blackburn's friends, relatives, or legal counsel; the composition of the confession by the Deputy Sheriff rather than by Blackburn - the chances of the confession's having been the product of a rational intellect and a free will become even more remote and the denial of due process even more egregious.

361 U.S. at 308-09. (Emphasis added). The description of police conduct is merely incidental to the Court's analysis in Blackburn.

The additional cases cited by Petitioner did involve police misconduct or coercion. However, whetner the absence of misconduct or coercion required a finding of voluntariness was not in issue in Townsend v. Sain and Culombe v. Connecticut. As this Court noted in Blackburn, the prohibition against the use of an involuntary confession at trial is not supported solely by prohibitions against coerced confession. "Thus a complex a values underlines the stricture against use by the state of confessions which . . . this Court terms involuntary, and the role played by each in any situation varies according to the particular circumstances of the case." 361 U.S. at 207. As in Blackburn, the particular circumstances of this case indicate that Mr. Connelly's statements were not voluntary because of his mental illness. This case in even more compelling than Blackburn because the expert witness was unrebutted and unequivocally concluded that Mr. Connelly had not acted voluntarily.

Other portions of the Colorado Supreme Court's opinion in Connelly also are consistent with and supported by existing case law. The Connelly court relied in part upon Hunter v. People, 655 P.2d 374 (Colo. 1982), which held that the state action required for a violation of due process occurred when the state used the defendant's confession to a private citizen without a prior determination of its voluntariness. This Court has reached a similar conclusion. "This Court's decisions establish that a state criminal trial, a proceeding initiated and conducted by the State itself, is an action of the state within the meaning of the Fourteenth Amemdment." Cuyler v. Sullivan, 446 U.S. 335, 343 (1980).

The Colorado Supreme Court's conclusion that a confession can be excluded as involuntary although not elicited or coerced by police also is in accord with the decisions of other state courts. These state opinions hold that a confession to a private citizen must be voluntary to be admitted into evidence. E.g., State v. Christopher, 10 Ariz. App. 169, 457 P.2d 356 (1969); Peak v. State, 342 So.2d 98 (Fla. App. 1977); Commonwealth v. Mahnke, 368 Mass. 662, 335 N.E.2d 660 (1975), cert. denied, 425 U.S. 959 (1976); Schaumberg v. State, 83 Nev. 372, 432 P.2d 500 (1967); State v. Kelly, 61 N.J. 283, 294 A.2d 41 (1972); State v. Cooper, 286 N.C. 549, 213 S.E.2d 305 (1975).

Mr. Connelly's statements were made while suffering command hallucinations as a result of chronic paronoid schizophrenia. The decision of the Colorado Supreme Court that they were involuntary and inadmissible is in accordance with the decisions of this Court and with the decisions of a variety of other state courts. The Colorado Supreme Court's opinion was not an extravagant extension of existing case law.

III

A DECISION OF THIS COURT ON THE MERITS WILL HAVE NO EFFECT ON THE CASE AGAINST MR. CONNELLY IN THE STATE COURT.

The Court's obligation to avoid rendering opinions only

advisory of federal rights, but not determinative of a case or controversy, warrants denial of the petition. Federal interference with this state court decision is not appropriate. A decision adverse to respondent here will not determine the outcome of this case.

The record reflects that Mr. Connelly approached Officer Anderson and stated that he had killed someone and wanted to tell the officer about it. Officer Anderson advised Mr. Connelly of his Miranda warnings, conducted a search for weapons and placed him in handcuffs. (Exhibit 2, pp. 7-11).

The Colorado Supreme Court concluded ". . . that the records of the suppression hearing adequately supports the court's determination that the Defendant's initial statement to Officer Anderson was not voluntarily made and that his statements subsequent to his arrest were not the result of a valid waiver of his Miranda rights." People v. Connelly, 702 P.2d at 729.

Petitioner in this case requests review of the state court's decision as to voluntariness only. "His later confession, which involves a Miranda issue, is not an issue in this petition." (State of Colorado's Petition for Writ of Certiorari, p. 15).

The only statement made by Mr. Connelly which is asked to be reviewed by this Court is his initial statement that he had killed someone and wanted to tell the officer about it. The Petitioner states in its petition that "the now excluded confession of the respondent permits him to walk free, because all the state's evidence is derivative from his initial confession to the previously unsolved murder." (Petition for Writ of Certiorari, pp. 17-18).

If the Petitioner were to prevail in this Court, the disposition of this case would not change. There exists no derivative evidence from Mr. Connelly's initial statement that he had killed someone and wanted to talk about it. No victim was identified. No method, location or individual was disclosed or could be discovered. No prosecution could take place based only on the information available from Respondent's initial statement.

CONCLUSION

For the reasons stated above, the Petition for Writ of Certiorari should be denied.

REPECTFULLY SUBMITTED

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CERTIFICATE OF SERVICE

I, Abelardo Perez Bernal, Jr., a member of the Bar of the Supreme Court of the United States and counsel of record for Francis Barry Connelly, respondent herein, certify that on October 30, 1985, I served one copy of the attached Brief in Opposition to Petition for Writ of Certiorari on Ms. Brooke Wunnicke, Chief Appellate District Attorney, counsel for Petitioner, by depositing same in the United States Mail, postage prepaid, addressed as follows:

Ms. Brooke Wunnicke
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